

IAQG 9104-001  
Frequently Asked Questions (FAQs)

**Issue: April 04, 2013**

**9104-1 Frequently Asked Questions (FAQ) Log**

FAQ Number	Question	Answer
1	<p><b>9104-001 clause 5.2.c and clause 6.4.</b> What does "continuing" mean in both of these clauses? Does "continuing" mean the person is currently working? Are both full time and part time persons allowed from an organization related to aviation, space, or defence industry? If "continuing" allows for a retired person, what is the criteria for "continuing" ?</p>	<p>Continuing means full time employment with no break in service in either the private (e.g. IAQG Member) or public (e.g. Government, Military) aviation, space and defense sector.</p> <p>It should be recognized that this is an advisory position (in accordance with ISO 17011, clause 4.3.2 for ABs and ISO 17021, clause 6.2.1 for CBs).</p> <p>The intent is to have a person that is actively employed in the aviation, space or defense industry on a full time basis. This full time employment should demonstrate the persons active engagement, involvement and continued awareness of activities in the Aviation, Space and Defense sector.</p>
2	<p><b>9104-001 clause 8.3.3.</b> In this clause what does "the entire audit" mean? Is it required that an AEA is required to participate at the on-site audit at each site during scheduled audit? For example, when one AEA and one AA perform audit at site "A" on the first day, and only the AA performs the audit at site "A" on the 2nd day, would this case satisfy with the requirement of clause 8.3.3? Does "the entire audit" mean that the AEA will participate all times during audit at each site?</p>	<p>The entire audit is from opening meeting until closing meeting and includes any associated preparation and report writing. This may also include several locations and sites for various certification structures (e.g. several site or Campus).</p> <p>The intent of the requirement is to have the AEA audit team leader actively involved in the entire audit and an AEA at each site during the audit. There should be no case (like the example given) where an AA will audit independently with no AEA on site.</p> <p>Also, please see 9104-001, Clause 8.3.2 for further clarification.</p> <p>This issue was also addressed in 9104-001 CSOC FAQs, Question Number 6.</p>
3	<p><b>9104-001 clause 8.3.8.</b> In this clause of the requirement "The same auditor shall be limited to no more than two certification cycles...." Is this retroactive? For example: An auditor has been auditing a client for the last six years and has just conducted the re-certification audit in 2012. Does the auditor have to give up this client to another auditor? Or, can the auditor be the lead auditor for this client for this certification cycle and the next certification cycle?</p>	<p>Yes, it is retroactive.</p> <p>Since you just conducted the recertification audit, you must give up this client as the AEA audit team leader at the next recertification audit. No, you cannot be the audit team leader for the next certification cycle.</p> <p>We encourage rotation of the audit team leader in this scenario but the requirement is linked to certification cycles. The requirement is retroactive and is linked to the next recertification audit activity.</p> <p>Please refer to IAQG OPMT Resolution number 96 for further clarification.</p>
4	<p><b>9104-001 clause 8.4.d.</b> In this clause what does "re-established" mean? For example clause 8.4 b) states 'No certificates to AQMS standards or any combination of AQMS standards requiring a certification decision shall be issued, unless all major and minor nonconformities have been contained; satisfactorily corrected with root cause analysis; and the corrective action has been implemented, reviewed, accepted, and verified by the CB. Does " re-established " mean "closure of nonconformities" as stated in clause 8.4 b) i.e. that all nonconformities have been contained; satisfactorily corrected with root cause analysis; and the corrective action has been implemented, reviewed, accepted, and verified by the CB?</p>	<p>The term "re-established" does not mean closure of the nonconformity. The root cause analysis and corrective action to prevent recurrence may not have been accomplished in the 60 day timeframe. However, the intent is to ensure all "containment" actions are complete. Containment actions will include taking the necessary action to ensure conformance to the existing QMS requirements. Additional root cause corrective action (to prevent recurrence) may take more than 60 days to complete but all steps and actions to be taken must be documented within the corrective action response.</p> <p>The term "days" are represented in calendar days.</p>

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5	<p><b>9104-001 clause 14.3.d.</b> What is the "escalation process" referred to in this clause?</p>	<p>The escalation process is defined in AS/EN/SJAC 9104-002 Clause 11.2.</p> <p>"11.2 All complaints shall be handled directly by complainant with the organization the complaint is against. The internal appeals / complaint processes of the parties involved are to be used before other actions are taken. If any issues cannot be resolved between affected parties, then the matter shall be escalated to the next level of authority within the ICOP scheme (e.g., IAQG member complaint against CB would elevate to AB then to SMS/CBMC, if unresolved). Any issues which cannot be resolved at the SMS/CBMC level shall be elevated to the IAQG OPMT. "</p>
6	<p><b>9104-001 clauses 3.23 and 6.7.k)</b> Is the meaning of "pre-audit" in 9101:2009 clause 4.3.1 the same as the meaning of "pre-audit" in 9104-001 clause 3.23 and 6.7 k) ?</p>	<p>No. 'Pre-audit' in 9104-001 refers to activities that occur before the start of the initial certification audit and may include an on-site audit to evaluate the suppliers quality management system before the beginning of the initial certification audit in addition to other activities that involve the CB contacting it's client. 'Pre-Audit Activities' in 9101 section 4.3.1 refers to the activities that take place after the start of the certification process as part of the preparation for an AQMS certification audit (primarily initial audit, but may refer to surveillance or recertification audits). 9101 section 4.3 refers to 'Audit Phase Specific Requirements'.</p> <p>It is expected that an accredited CB would document any services they provide to a client that occur before the start of the initial certification audit so that the CB's processes involving ISO 17021 and 9104-001 requirements on impartiality and avoidance of consultancy can be assessed by the accrediting AB or during oversight. It is recognised that discussions requiring client contact to be able to make an informed application for AQMS certification may occur more than once. Specifically, no more than one on-site audit event before the start of the initial certification</p>
7	<p><b>9104-001 clause 6.11</b> What does "CBs shall ensure that classified material or export control requirements, related to CB auditor access, are disclosed to their aviation, space, and defense clients" mean in clause 6.11?  Can a CB disclose classified material or export control requirements, related to CB auditor access, to their aviation, space, and defense clients ?</p>	<p>The intent of this requirement is that the CB and their client need to have a discussion to determine whether some classified, or proprietary areas of client's facility may have restricted access, may be subject to export control restrictions or may require to be excluded from the audit in order to meet local or national laws, and/or preserve confidentiality throughout the audit and certification process. And as result of this discussion, it is expected that agreements are reached about where the audit can and will take place, who the auditors will be and establish their legal ability to audit the client's management system, products and processes. Arrangements may include limitations on citizenship, access, security clearance or similar and may include the signing of legally binding documents such as confidentiality agreements or NDA's (Non-Disclosure Agreements) in order to preserve the confidentiality of the products and processes audited.</p>
8	<p><b>9104-001 clause 8.2.1.3 b) and 8.9.b)</b>  Does "the defined audit duration" in clause 8.2.1.3 b) mean the audit duration after adding a minimum of 10% from clause 8.2.1.3.c) to the total duration defined by Table 2?  Clause 8.9 b) "The ASRP process outlined in IAF MD 3 shall not reduce the Table 2 required on-site audit duration by more than 30% for single, campus, several, and ---.",</p>	<p>Yes. In clause 8.2.1.3.b) "the defined audit duration" means the calculated audit duration after adding a minimum of 10% to the total duration defined by Table 2.</p> <p>The same expectation is required for clause 8.9 b) and "the Table 2 required on-site audit duration". In clause 8.9 b) "the Table 2 required on-site audit duration" shall be deemed to be replaced with "the defined audit duration" for a Campus structure. Where applicable, a permissible reduction for ASRP may be applied after the increase of 10% required by by clause 8.2.1.3.c) for a Campus certification structure.</p>
9	<p><b>9104-001 clauses 5.3.5, 9.c) and 10.4 c)</b>  Within these clauses the terms 'may' and 'shall' are both used in relation to the results of oversight witnessed assessments being shared with the applicable AAB in the event that AQMS auditor competency issues are identified. Which is correct?</p>	<p>In 9104-001 clauses 5.3.5 and 9.c) the word "shall" is made optional by the term "when deemed appropriate" which precedes the "shall" in each requirement. In clause 10.4.c) a different term, "may" is used. When the whole of each requirement is read together, although different words are used, each requirement is actually the same. Identifying an AQMS Auditor Competency issue to the applicable AAB is optional and is to be decided by the entities conducting the oversight at the time a competency issue is determined. The decision to advise the AAB should be based on the severity of the competency issue identified and the impact on the effectiveness of the audit as witnessed to be able to correctly determine the conformance and effectiveness of the management system being audited.</p>

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10	<p><b>9104-001 clause 8.2.1.2 and Table 2</b> For multiple site certification structures, if 100% of sites are sampled in the first surveillance year, is it acceptable that only the site containing the central function is audited in second surveillance year?</p>	<p>No. The intent is that the site containing the central function and approximately 50% of the sites are audited each surveillance year for category 1, and approximately 33% of the sites are audited each surveillance year for category 2. Auditing 100% of the sites in one year does not comply with the requirement to audit approximately 50% or 33% of the sites (according to established category) and does not remove the site sampling requirement for the other surveillance year. Auditing 100% of the sites in one surveillance year and none in the second surveillance year would not be a conforming practice within IAF MD 5 and it is not a conforming practice under 9104-001 requirements.</p>
11	<p><b>9104-001 clause 5.3.1 c) and 5.3.2 a)</b> Does "complete" mean "all clauses" of 9100 or 9110 standard?</p>	<p>It may not be possible for an AB to witness all clauses and sub-clauses being actively audited during a witness assessment due to the scope of the applicant CB's client and where there may only be one or a very small number of clients available for the assessment. In such cases the intent of witnessing the 'complete' standard means the AB witness assesses of the whole of the CB's AQMS audit for stage 1 and stage 2 and the auditing of the applicability of any permissible exclusions. In this way the AB is able to witness assess all clauses of the applicable AQMS standard, i.e. the 'complete' AQMS standard.</p>

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<b>9104-001 Certification Structure Oversight Committee (CSOC) Frequently Asked Questions (FAQ) Log</b>		
<b>CSOC FAQ Number</b>	<b>Question</b>	<b>Answer</b>
1	Clarify Audit Programme	<p>An audit programme (from ISO 9000) is a set of one or more audits planned for a specific time frame and directed towards a specific purpose</p> <p>- The ISO 17021 clause 9.1.1 says:</p> <ul style="list-style-type: none"> <li>+ An audit programme for the full certification cycle shall be developed to clearly identify the audit activity required to demonstrate that the client's management system fulfils the requirements for certification to the selected standard</li> <li>+ The audit programme shall include a two-stage initial audit, surveillance audits in the first and second years, and a recertification audit in the third year prior to expiration of certification. The three-year certification cycle begins with the certification or recertification decision. The determination of the audit programme and any subsequent adjustments shall consider the size of the client organization, the scope and complexity of its management system, products and processes as well as demonstrated level of management system effectiveness and the results of any previous audits.</li> </ul> <p>- The ISO17021 Appendix F also gives some guidelines about the items to take into consideration when building an audit programme</p> <p>The ICOP certification process identifies a three year certification cycle.</p> <p>A detailed audit plan is not necessary for CSOC applications however an audit programme for the three year certification cycle is required.</p>
2	What level of product descriptions is required?	<p>Simple but clear (not 10 pages) but sufficient to provide understanding to industry professionals that may not be familiar with the specific product(s)</p> <p>The intent is to validate whether the certification structures are fitting the products and their associated value stream(s).</p>
3	How do I attach more than two files to the CSOC feedback request?	<p>Use Win Zip or embed files as objects within a collector file e.g. a Word file. Software other than Win Zip should not be used as the CSOC may not be able to open the files.</p>
4	Can a site be split between different certification structures, and the headcount split accordingly?	<p>A site within a complex certification structure may contain one or more value streams. As a result of there being more than one value stream, one or more departments that may be administrative or service related in nature (e.g. human resources, office staff, facilities) may support one or more value streams. Where a site supports more than one value stream the following allocation rules for determining the number of effective personnel / employees shall apply:</p> <ul style="list-style-type: none"> <li>- Where personnel / employees on a site can be clearly identified as allocated to a specific value stream, only the number personnel / employees permanently allocated to that specific value stream require to be taken into account in determining the effective number of personnel / employees;</li> <li>- In all other cases, where personnel / employees on a site are allocated to more than one value stream simultaneously the total number of employees for a specific site shall be taken into account for each and every value stream they are involved in supporting.</li> </ul> <p>Note 1: It is possible that a site may contain a mix of these conditions e.g. centralized design and centralized purchasing but distinctly separated manufacturing. In this case the effective number of employees shall be allocated according to the established rules.'</p> <p>Note 2: It should also be recognized that additional audit time is needed for this certification structure because each value stream should be audited for conformance, including it's support processes (e.g., objective evidence gathered, specific to each value stream).</p>

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5	<p>What is meant by justification in the application file? (e.g. audit days)</p> <p>Is it required that a CB creates a record, document or a form to support objective evidence of conformance?</p>	<p>'Justification' is something that shows an action to be reasonable or necessary ; e.g. records that show that the audit time determined by the CB is appropriate for a specific client at a particular time</p> <p>- See also ISO17021 §9.1.4.1 for detailed items to be analyzed for the justification of audit duration</p> <p>ISO 17021:2006 clauses 9.1.4 and 9.9.2.d) and ISO 17021:2011 clauses 9.1.4.1 and 9.9.2.d) require the CB to maintain records of the justification of the determination of the audit time. The format of that record is defined by the particular CB as part of their management system. All CB records regarding the audit and other certification activities for all organizations that submitted applications, were audited, certificated, suspended or withdrawn are to be maintained in accordance with ISO 17021 clause 9.9.4</p>
6	<p>Does the requirement 8.3.3 for a lead auditor to be on site at one site during all audit activity apply to complex structures, as it may be difficult in case of worldwide spread audits?</p>	<p>This requirement has been written to ensure that when an audit is spread all over the world in more than one zones access by the AEAs and AAs to the lead auditor for review of findings, clarification, consultation or escalation of questions. It is understood that the lead auditor may not be available at all times while an audit is performed and a local audit team leader may be temporarily in charge of this role for a local site.</p> <p>In all cases, the lead auditor shall perform a significant part of the total audit and access for co-ordination shall be ensured, to meet the intent of the requirement. This may be achieved through daily synthesis meetings or teleconferences, e-mail exchanges, daily reports from auditors, etc as required to ensure an effective audit is conducted.</p> <p>The 9104-1 clause 8.3.7 remains valid. The audit team leader shall be responsible for ensuring the completeness of the audit and the accuracy of the audit report, findings, and conclusions for the whole audit.</p> <p>It is recognised that over the course of the audit programme the lead auditor may change.</p>
7	<p>What does "single" of "a single value stream "mean?</p> <p>For example, in the case of a big company composed of more than one site which delivers Aircraft to the customer, can a "value stream" be considered as a "single value stream" for single campus ?</p> <p>If the company composed of some sites provide three kind of aerospace products (not substantially (i.e., &lt;80 %) the same, but through to the same methods and procedures), can "value stream" be considered as "triple value stream" for triple campus ?</p>	<p>A value stream is defined in 9104-1 clause 3.27 as: 'An end-to-end business process which delivers a product or service to a customer. The process steps may use and produce intermediate goods, services, and information to achieve the end product or service.'</p> <p>A 'single value stream' would therefore using the above definition would mean one end-to-end business process which delivers a product or service to a customer. The process steps may use and produce intermediate goods, services, and information to achieve the end product or service.</p> <p>Different products may be realised in one value stream providing the methods and procedures are &gt;80% the same. The product(s) must be defined in order to determine whether the methods and procedures used to realise the product are substantially the same .</p>
8	<p>What is the Central Office or Central Function for a certification structure?</p> <p>Is there a difference between the central function and the controlling address required for the certification document?</p>	<p>There is only one overall Central Office (or Central Function) for each certification structure:</p> <p>- The definition for Central Office is located in 9104-1 at clause 3.8 and is 'the organization location/activity that controls the 'common' quality management system for the organization under a single AQMS standard certificate.'</p> <p>- 9104-1 clause 8.1.1.c requires that the central function / office:</p> <ul style="list-style-type: none"> <li>&gt; Controls the common management system</li> <li>&gt; Conducts the common management review</li> <li>&gt; Controls the internal audit program</li> <li>&gt; Has the authority to require all sites to implement corrective action as needed</li> <li>&gt; Collects and analyses data from all sites</li> <li>&gt; Has the authority and ability to initiate organizational change in regard to system documentation, system changes, management review, complaints, evaluation of corrective actions, internal audit planning and review of associated results and legal requirements.</li> </ul> <p>- 9104-1 Appendix B always describes the central office in a singular context.</p> <p>The controlling address is used in campus structure only to identify a single location to be listed on the certificate and in OASIS. It is up to the certificated organisation to decide if this is the same address as the central office or central function.</p>

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9	When a CB has implemented 9104-1 requirements during the current annual audit cycle and the CB client organization is transitioning to 9100, 9110 or 9120:2009, what are the requirements for the minimum on-site audit duration?	The on-site audit duration for transitioning for both 91XX:2009 and 9104-1 in the same audit are defined in SR-002 at clause 4.12.a that state: The minimum on-site audit days for all 9100/9110/9120:2009 transition audits shall be as follows: 1. Transition during surveillance audit using 50% of initial audit day requirements from Table 2 of 9104-1. 2. Transition during recertification audit using 80% of initial audit day requirements from Table 2 of 9104-1
10	Can a client with a certification structure other than single site segregate access to tier 2 audit report data in OASIS on a site by site basis?	Organizations personnel must recognise that data from all sites needs is equally available when access to tier 2 data is granted by the certified organisation. One audit report is written for all sites under a single certification. This audit report is uploaded into OASIS and can be seen as tier 2 data for all of the sites under the certification. The audit results for a particular site may be recorded on a 9101 Appendix G. The 'Note' for the instructions for completion of 9101 Annex G states 'This form can be used to provide detailed audit results on an individual site, if the audit report (Annex E) does not include audit details for this site.'
11	At what step in the audit duration calculation process should allowable reductions (ASRP and Table 4 for Several Sites certification structure) be taken? Prior to or after the expected ISO 17021 additions?	The intent of 9104-1 is that any permissible reductions should be made prior to the expected additions of ISO 17021 clause 9.1.4 and IAF MD 5 additions. For reductions you use table two audit days as the denominator when calculating percent reduction except for campus which should used table 2 audit days plus mandatory 10% increase. Agreed reductions are only permissible under certain specific conditions as specified in 9104-1. CAAT does not allow a reduction only a transfer from on-site audit duration to off-site audit duration.
12	<b>9104-001 clause 8.2.1.5</b> Within a complex certification structure, is the mixing of sub-categories within the sub-structures allowed e.g. may a several sites reduction be applied to a multiple site or campus sub-structure, or multiple site sampling be applied to more than one campus?	No. The mixing or co-mingling of sub-categories including the on-site audit duration calculation or site sampling is not permissible. The intent is that each sub-structure established within a complex structure uses the requirements only for that identified sub-structure including the on-site audit duration calculation e.g. a multiple site sub-structure would use the on site audit calculation methodology from 9104-001 clause 8.2.1.2 or a campus sub-structure would use the calculation methodology from 9104-001 clause 8.2.1.3. Similarly the site sampling requirements are to apply to each substructure e.g. all sites within a campus sub-structure must be visited every year.
13	<b>9104-001 clause 8.2.1.5</b> How should a CB provide evidence of compliance to the eligibility criteria for the overall complex structure and the sub-structures within the complex certification structure?	9104-001 clause 8.1 sets out the eligibility criteria for all certification structures in two parts; a general description of eligibility criteria for all certification structures at 8.1.1 and in addition eligibility criteria for each certification structure type at 8.1.2. This also points at 9104-001 Appendix B that has a detailed description of the eligibility criteria in the second row of the table beneath the header row.  Whilst it is not appropriate for the CSOC to describe how a CB provides evidence of compliance to the eligibility criteria for the overall complex structure and the sub-structures within the complex certification structure, the CSOC can advise that the voting members are looking for evidence of the evaluation and determination of the overall complex certification structure and each of the sub-structures within the complex structure. Part of evaluation is the demonstration that all the applicable eligibility criteria have been met. It is only through the detailed analysis and development of such a record that it can be demonstrated that a client really fits a particular certification structure. The CSOC is looking to see that the applicant CB and the client have achieved that understanding and can demonstrate the fit of the correct certification structure.  As part of 9104-001 clause 8.1.3, it is a requirement for all CB's to maintain evidence of the review and determination of certification structures for all clients. The CSOC expects that CB's have a process in place to satisfy this as part of the accreditation to achieve compliance with this requirement.
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